

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

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COMMON CAUSE GEORGIA, as an  
organization,

*Plaintiff,*

v.

ROBYN CRITTENDEN, in her official  
capacity as Secretary of State of Georgia

*Defendant.*

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Case No. 18-cv-05102-AT

**JOINT PROPOSED SCHEDULE**

The parties, having met and conferred, file this joint proposed schedule,  
pursuant to the Court's November 12, 2018 Order [62].

In connection with the December 4, 2018 run-off election, Defendant will  
substantially comply with the requirements of the Court's prior order. Defendant  
will:

- (1) establish and publicize a free-access hotline for provisional ballot voters to determine whether their provisional ballots were counted and, if not, the reason why;
- (2) issue to all counties substantially the same guidance regarding the hotline that she issued in her November 14, 2018 OEB titled “Secretary of State Public Website for Provisional Ballot Information”; and
- (3) issue to all counties substantially the same guidance regarding the counting of provisional ballots that she issued in her November 14, 2018 OEB titled “Direction to Review Provisional Ballots Coded ‘PR’”. This guidance will not be limited to counties that have 100 or more provisional ballots.

In light of these representations, Plaintiff will not seek a preliminary injunction at this time.

The parties propose the following schedule for fact and expert discovery, motion practice, and trial:

Fact discovery deadline –	Feb. 15, 2019
Plaintiff’s expert reports due –	March 1, 2019
Defendant’s expert reports due –	March 15, 2019
Parties’ rebuttal expert reports due –	March 29, 2019

Expert depositions deadline – April 19, 2019

Summary judgment motions due – April 29, 2019

Summary judgment oppositions due – May 20, 2019

Summary judgment replies due – May 27, 2019

Trial-ready date – July 1, 2019

The parties are exploring whether this proposed schedule will give Defendant sufficient time to comply with any resulting relief in advance of the November 2019 election, and each party reserves the right to request alterations to this schedule.

This 26th day of November, 2018.

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### **CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing JOINT PROPOSED SCHEDULE was prepared double-spaced in 14-point Times New Roman pursuant to Local Rule 5.1(C).

/s/ F. Skip Sugarman

F. Skip Sugarman  
Sugarman Law LLP

**CERTIFICATE OF SERVICE**

I hereby certify that on November 26, 2018, I served the within and foregoing JOINT PROPOSED SCHEDULE with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all parties to this matter via electronic notification or otherwise.

This 26th day of November, 2018.

/s/ F. Skip Sugarman  
F. Skip Sugarman  
Sugarman Law LLP